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14 Attorneys for Defendant  
GOOGLE INC.

15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

18 ORACLE AMERICA, INC.

19 Plaintiff,

20 v.

21 GOOGLE INC.

22 Defendant.  
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Case No. 3:10-cv-03561-WHA

Honorable Judge William Alsup

**DECLARATION OF RACHEL CLAFLIN  
REGARDING GOOGLE'S PRODUCTION  
OF ANDROID FINANCIAL DATA IN  
THIS LITIGATION**

1 I, Rachel Claflin, hereby declare and state as follows:

2 1. I am a paralegal employed by Google Inc. I have personal knowledge of the facts  
3 set forth in this declaration, and, if called to do so, I could and would competently testify thereto.

4 2. I am the in-house Google paralegal assigned to this litigation. I was personally  
5 involved with the search for, collection of, and production of financial and damages-related  
6 documents throughout the discovery phase of this litigation. In this litigation, I have had  
7 primary, general responsibility for overseeing the search for and collection of documents from  
8 Google's internal custodial and non-custodial repositories. Part of my responsibility on this case  
9 has been to ensure that potentially relevant documents from Google's internal repositories are  
10 collected and forwarded directly to Google's outside counsel or to Google's document vendor so  
11 that the documents can be properly reviewed, processed and produced.  
12

13 3. Many of the non-custodial financial and damages-related documents produced by  
14 Google were collected from Google's internal Android finance website, including the Android  
15 P&Ls bearing production numbers GOOGLE-00303710 and GOOGLE-00395614, the Android  
16 OC Quarterly Reviews bearing production numbers GOOGLE-00303725 - 756, GOOGLE-  
17 00395727 - 758, GOOGLE-00303867 - 884, GOOGLE-00395188 - 205, GOOGLE-00395147 -  
18 170, and GOOGLE-00395207 - 248, the Android Financial Reviews bearing production numbers  
19 GOOGLE-0395669 - GOOGLE-0395682, GOOGLE-00395696 - GOOGLE-00395716,  
20 GOOGLE-00395717 - GOOGLE-00395726, and GOOGLE-00395683 - GOOGLE-00395695,  
21 and financial documents that include engineering and other expenses related to Android bearing  
22 production numbers GOOGLE-00395261 and GOOGLE-00396037. This internal Google  
23 website serves as a repository for Google's Android-related financial information and includes,  
24 for example, copies of Android P&L statements, Android OC Quarterly Review presentations  
25 and Android Finance Review presentations. I understand that Google first produced content  
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1 from this internal site on January 6, 2011 bearing production numbers GOOGLE-00303691 -  
2 921. I understand that Google again produced content from this internal site on April 5, 2011  
3 bearing production numbers GOOGLE-00395080 - 6318. The documents in these production  
4 ranges were collected from the Android finance website and forwarded to Google's outside  
5 document vendor for review by Google's outside attorneys prior to their production.

6 4. On September 29, 2011, after the close of fact discovery, Google provided its  
7 outside counsel with an updated Android P&L that included actual revenue and cost information  
8 through August 2011. This Android P&L was collected from Aditya Agarwal.

9 5. I understand that on April 26, 2012, Google produced an Android P&L to Oracle  
10 bearing production numbers GOOGLE-00-00002800 - GOOGLE-00-00002806. I understand  
11 that this Android P&L was used as an exhibit, marked TX1079, during the videotaped deposition  
12 of Andrew Rubin, taken on April 27, 2012, and that this Android P&L was discussed during an  
13 oral argument before this Court on May 3, 2012. *See Exhibit A to the Declaration of Christopher*  
14 *C. Carnaval Regarding Google's Production of Android Financial Data in this Litigation*, filed  
15 herewith. This Android P&L was collected from Aditya Agarwal.

16 6. In addition to Google's collection of non-custodial financial documents related to  
17 Android, Google also collected custodial records related to Android from specified custodians.  
18 After collecting these custodial documents, Google forwarded them to its outside document  
19 vendor for processing, attorney review and production.

20 I declare under penalty of perjury under the laws of the United States of America that the  
21 foregoing is true and correct and that this declaration was executed this 7th day of May, 2012, in  
22 Mountain View, California.

23 Dated: May 7, 2012

24 /s/ Rachel Claflin

25 Rachel Claflin